

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF OHIO**

**IN RE:** : **Chapter 13 Proceedings**  
**Venessa (NMN) Butler,** : **Case No.: 20-60571**  
: **Judge Russ Kendig**

**Debtor**

**TRUSTEE'S OBJECTION TO CONFIRMATION  
OF CHAPTER 13 PLAN DATED MARCH 26, 2020**

Now comes Dynele L. Schinker-Kuharich, Standing Chapter 13 Trustee, for the above captioned case and objects to Confirmation of the proposed Plan of the Debtor(s) on the grounds that said Plan is in violation of 11 U.S.C. Section(s):

**Good Faith**

1325 (a) (3) the plan has been proposed in good faith and not by any means forbidden by law.

**Unfeasible**

1325 (a) (6) the debtor will be able to make all payments under the plan and to comply with the plan

1325 (a) (1) the plan complies with the provisions of this chapter and with the other applicable provisions of this title.

**The Plan is currently unfeasible.**

Wherefore, Trustee prays that Confirmation of the Chapter 13 Plan of Debtor(s) be denied.

/s/ Dynele L. Schinker-Kuharich  
Dynele L. Schinker-Kuharich (0069389)  
Chapter 13 Trustee  
A. Michelle Jackson Limas (0074750)  
Staff Counsel to the Chapter 13 Trustee  
200 Market Avenue North, Ste. 30  
Canton, OH 44702  
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**CERTIFICATE OF SERVICE**

I hereby certify that on June 9, 2020, a true and correct copy of the Objection to Confirmation of Chapter 13 Plan was served via the Court's Electronic Case Filing System upon these entities and individuals who are listed on the Court's Electronic Mail Notice List:

- Office of the United States Trustee at [RegisteredEmailAddress]@usdoj.gov
- Office of the Chapter 13 Trustee, at dlsk@Chapter13Canton.com
- Douglas L. Thrush, Counsel for Venessa (NMN) Butler, at bankruptcy@dlthrushbk.com

and by regular U.S. Mail, postage prepaid, upon:

Venessa (NMN) Butler, Debtor  
198 Helen Avenue  
Mansfield, OH 44906

/s/ Dynele L. Schinker-Kuharich  
Dynele L. Schinker-Kuharich  
Chapter 13 Trustee